

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARTIN M. MATUS, O.D.,	)	
on behalf of plaintiff and	)	
the class members defined herein,	)	
	)	19 C 1797
Plaintiff,	)	
	)	Judge Dow
v.	)	Magistrate Judge Valdez
	)	
NORTH AMERICAN BANCARD, LLC,	)	
and JOHN DOES 1-10,	)	
	)	
Defendants.	)	

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND TIME**

Plaintiff Martin M. Matus, O.D. respectfully requests pursuant to Fed. R. Civ. P. 6(b) an extension of time to file the motion for preliminary approval of the parties’ class action settlement. In support thereof, plaintiff states:

1. Plaintiff and Defendant North American Bancard, LLC filed a notice of settlement on February 5, 2021. (*Dkt. No. 54*)
2. On February 15, 2021, this Court entered an order directing the parties to notice up the motion for settlement approval on March 26, 2021. (*Dkt. No. 55*)
3. The Parties have made significant progress on the settlement documents. Several drafts of settlement documents have been exchanged and the Parties believe that they are close to finalizing the settlement documents.
4. Accordingly, Plaintiff requests an extension of time from March 26, 2021 through and including April 5, 2021 to file the motion for preliminary approval.

5. Plaintiff does not request this extension for purposes of delay but rather to provide the Parties additional time to finalize and execute the settlement documents. Good cause exists to extend time as the Parties continue to work in good faith on the settlement.

6. Plaintiff has contacted Defendant in advance of filing this motion and Defendant does not oppose the relief requested in this motion.

WHEREFORE, Plaintiff requests an extension of time from March 26, 2021 through and including April 5, 2021 to file the motion for preliminary approval.

Respectfully submitted,

s/ Heather Kolbus  
Heather Kolbus

Daniel A. Edelman  
Cathleen M. Combs  
Heather Kolbus  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
20 S. Clark Street, Suite 1500  
Chicago, IL 60603  
(312) 739-4200

**CERTIFICATE OF SERVICE**

I, Heather Kolbus, certify that on March 24, 2021, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF system which caused notice via email to be sent to the following parties:

Lawren Zann – lawren.zann@gmlaw.com  
Beth-Ann E. Krinsky – beth-ann.krinsky@gmlaw.com  
Greenspoon Marder LLP  
200 East Broward Blvd., Suite 1800  
Fort Lauderdale, FL 33301

Timothy A. Hudson – thudson@tdrlawfirm.com  
Tabet DiVito & Rothstein LLC  
209 South LaSalle Street, 7th Floor  
Chicago, IL 60604

s/ Heather Kolbus  
Heather Kolbus

Daniel A. Edelman  
Cathleen M. Combs  
Heather A. Kolbus  
**EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC**  
20 S. Clark Street, Suite 1500  
Chicago, IL 60603  
(312) 739-4200  
(312) 419-0379 (FAX)